

CRYSTAL M. LONG
LONG vs ABILITY RECOVERY SERVICES

February 19, 2018

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<p style="text-align: center;">**CONFIDENTIAL**</p> <p style="text-align: center;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF MARYLAND</p> <p>3 CRYSTAL LONG, :</p> <p>4 Plaintiff, :</p> <p>5 v. : Civil Action No:</p> <p>6 PENDRICK CAPITAL : 8:17-cv-01955-GJH</p> <p>7 PARTNERS, II, LLC, :</p> <p>8 ABILITY RECOVERY : :</p> <p>9 SERVICES, LLC, : :</p> <p>10 EXPERIAN INFORMATION : :</p> <p>11 SOLUTIONS, INC., : :</p> <p>12 and : :</p> <p>13 EQUIFAX INFORMATION : :</p> <p>14 SYSTEMS, LLC, : :</p> <p>15 Defendants. : :</p> <p>16 CONFIDENTIAL DEPOSITION OF CRYSTAL M. LONG</p> <p>17 Monday, February 19, 2018</p> <p>18 1:01 p.m.</p> <p>19 The Goldson Law Office</p> <p>20 1734 Elton Road</p> <p>21 Suite 210</p> <p>22 Silver Spring, Maryland</p> <p>Terry L. Bradley, Court Reporter</p>	<p style="text-align: center;">Page 3</p> <p>1 INDEX OF EXAMINATION</p> <p>2</p> <p>3 EXAMINATION PAGE</p> <p>4 By Mr. Metcho. 4</p> <p>5 By Mr. Marcus. 65</p> <p>6</p> <p>7</p> <p>8 INDEX OF EXHIBITS</p> <p>9 **1. TransUnion Report 4/26/17 57</p> <p>10 **2. Mint Notification 75</p> <p>11</p> <p>12 **CONFIDENTIAL</p> <p>13 (Original Exhibits retained by Court Reporter.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p style="text-align: center;">Page 2</p> <p>1 APPEARANCES OF COUNSEL</p> <p>2</p> <p>3 For the Plaintiff:</p> <p>4 THE GOLDSON LAW OFFICE</p> <p>5 INGMAR B. GOLDSON, ESQ.</p> <p>6 COURTNEY WEINER, ESQ.</p> <p>7 1734 Elton Road</p> <p>8 Suite 210</p> <p>9 Silver Spring, MD 20903</p> <p>10 T-240.780.8829</p> <p>11 E-igoldson@goldsonlawoffice.com</p> <p>12</p> <p>13 For the Defendant Ability Recovery</p> <p>14 Services, LLC:</p> <p>15 MARSHALL, DENNEHEY, WARNER, COLEMAN</p> <p>16 & GOGGIN</p> <p>17 RONALD M. METCHO, II</p> <p>18 2000 Market Street</p> <p>19 Philadelphia, PA 19103</p> <p>20 T-215.575.2595</p> <p>21 E-rmetcho@mdwcg.com</p> <p>22</p> <p>15 For the Defendant Pendrick Capital</p> <p>16 Partners II, LLC:</p> <p>17 SESSIONS, FISHMAN, NATHAN & ISRAEL</p> <p>18 MORGAN I. MARCUS, ESQ.</p> <p>19 120 South LaSalle Street</p> <p>20 Suite 1960</p> <p>21 Chicago, IL 60603</p> <p>22 T-312.578.0990</p> <p>E-mmarcus@sessions.legal</p>	<p style="text-align: center;">Page 4</p> <p>1 PROCEEDINGS</p> <p>2</p> <p>3 CRYSTAL M. LONG,</p> <p>4 having been first duly sworn, testified as</p> <p>5 follows:</p> <p>6</p> <p>7 EXAMINATION</p> <p>8 BY MR. METCHO:</p> <p>9 Q. You ready?</p> <p>10 Good afternoon, Ms. Long. My name</p> <p>11 is Ron Metcho. I'm with the law firm of</p> <p>12 Marshall, Dennehey, Warner, Coleman & Goggin.</p> <p>13 I represent an entity by the name of Ability</p> <p>14 Recovery Services LLC in a lawsuit that has</p> <p>15 been filed in the United States District Court</p> <p>16 for the District of Maryland. Alongside me</p> <p>17 here is Morgan Marcus, who represents Pendrick</p> <p>18 Capital Partners, who is the creditor at issue</p> <p>19 in this particular matter. And I'd like to</p> <p>20 thank you for being here today.</p> <p>21 You know, I know that Mr. Marcus</p> <p>22 needs to get on a flight at approximately</p>

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1 A. No.

2 Q. Okay. So what we're going to do

3 today is we're going to ask a series of

4 questions, again, regarding the allegations in

5 your complaint, the allegations against my

6 client, and also against Pendrick. We do not

7 have representatives of the other two remaining

8 defendants, Experian and Equifax here, so you

9 know, we'll leave it that. Again, this is your

10 first instance in sitting in a deposition?

11 A. That's correct.

12 Q. So what I'd like to ask you to do is

13 listen to the full question I ask you, give

14 your counsel an opportunities to object if it's

15 necessary, and then provide a complete answer

16 to the questions. What we don't want to do

17 is --

18 We want to have a complete record

19 for the Court, so please refrain from saying

20 such things as "uh-huh" and "yes" and "no"

21 answers and complete answers to the best of

22 your ability, okay?

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1 What is your current address?

2 A. [REDACTED]

3 [REDACTED] Maryland,

4 [REDACTED]

5 Q. How long have you lived there?

6 A. 5 years.

7 Q. Do you own or rent the space?

8 A. I own.

9 Q. Okay. How much is approximately

10 your mortgage payment monthly?

11 A. 1933.

12 Q. Are you married?

13 A. No.

14 Q. Do you have any children?

15 A. No.

16 Q. Have you ever been married?

17 A. No.

18 Q. What's your current telephone

19 number?

20 A. [REDACTED] 8476.

21 Q. Do you have any dependents?

22 A. No.

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<p style="text-align: right;">Page 9</p> <p>1 Q. Do you live alone?</p> <p>2 A. Yes.</p> <p>3 Q. Just a little bit about your</p> <p>4 educational background. What's your highest</p> <p>5 level of education?</p> <p>6 A. Master's degree.</p> <p>7 Q. Where did you get your Master's</p> <p>8 degree from?</p> <p>9 A. Walden University, W-A-L-D-E-N.</p> <p>10 Q. And what is the Master's degree in?</p> <p>11 A. Business.</p> <p>12 Q. I'm assuming you have an</p> <p>13 undergraduate degree obviously?</p> <p>14 A. I do.</p> <p>15 Q. And where is that from?</p> <p>16 A. Bowie State University.</p> <p>17 Q. And what is your undergraduate</p> <p>18 degree in?</p> <p>19 A. Business.</p> <p>20 Q. Where did you go to high school?</p> <p>21 A. Jenks High School.</p> <p>22 Q. And where is that located?</p>	<p style="text-align: right;">Page 11</p> <p>1 This was not the place of employment</p> <p>2 that you were at in regards to the allegations</p> <p>3 in your complaint. Is that correct?</p> <p>4 A. I don't understand your question.</p> <p>5 Q. In your complaint you allege that</p> <p>6 you were employed at a certain place between</p> <p>7 roughly November of 2016 through May of 2017.</p> <p>8 A. Yes.</p> <p>9 Q. This was a different --</p> <p>10 A. That's Trusted Health Plans Inc.</p> <p>11 Q. You were at the same place?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And what do you do at Trusted</p> <p>14 Plans Inc?</p> <p>15 A. I am the Director of Health Plan</p> <p>16 Accounting. I run the finance department.</p> <p>17 Q. Can you describe what your daily</p> <p>18 activities of your work are.</p> <p>19 A. That would include overseeing the</p> <p>20 staff accountants, the temps, closing the</p> <p>21 books, approving financial transactions, and</p> <p>22 reviewing staff accountants' work.</p>
<p style="text-align: right;">Page 10</p> <p>1 A. Jenks, Oklahoma.</p> <p>2 Q. How long did you live in Oklahoma?</p> <p>3 A. Um, let's see. From 3rd grade to</p> <p>4 senior high school. I'm not sure how old you</p> <p>5 are in when you're in 3rd grade.</p> <p>6 Q. When did you relocate to --</p> <p>7 Excuse me. When do you move to</p> <p>8 Maryland from Oklahoma?</p> <p>9 A. 1999.</p> <p>10 Q. And what was the reason for the</p> <p>11 move?</p> <p>12 A. To attend college.</p> <p>13 Q. Okay. Who's your current employer?</p> <p>14 A. Trusted Health Plans Inc.</p> <p>15 Q. Can you spell that, please?</p> <p>16 A. T-R-U-S-T-E-D, Plans, P-L-A-N-S,</p> <p>17 Inc.</p> <p>18 Q. And how long have you been at this</p> <p>19 place of employment?</p> <p>20 A. A year and 5 months.</p> <p>21 Q. Okay. Now was this the place of</p> <p>22 employment --</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. What do you mean by "closing the</p> <p>2 books"?</p> <p>3 A. That would include ensuring that the</p> <p>4 bank reconciliations are reconciled, that</p> <p>5 includes approving payments, that includes</p> <p>6 reviewing invoices for approval, that includes</p> <p>7 issuing financial statements.</p> <p>8 Q. Issuing financial statements to</p> <p>9 whom?</p> <p>10 A. To the CFO to be presented to the</p> <p>11 Board of Directors.</p> <p>12 Q. And how long have you been at this</p> <p>13 place of employment?</p> <p>14 A. A year and 5 months.</p> <p>15 Q. When you first began at this place</p> <p>16 of employment what was your original position?</p> <p>17 A. Senior Account Manager.</p> <p>18 Q. Have you had the same position at</p> <p>19 this place of employment throughout your entire</p> <p>20 employment?</p> <p>21 A. I'm not sure of your question. Can</p> <p>22 you repeat it.</p>

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<p style="text-align: right;">Page 13</p> <p>1 Q. Sure. When you began working this</p> <p>2 job have you had different positions throughout</p> <p>3 your employment?</p> <p>4 A. Yes.</p> <p>5 Q. Can you please tell me about each</p> <p>6 one of your positions of employment.</p> <p>7 A. I was the Senior Account Manager --</p> <p>8 Q. Let's step back a second. When you</p> <p>9 first started what was your employment</p> <p>10 position?</p> <p>11 A. Senior Account Manager.</p> <p>12 Q. Okay. And what was your next</p> <p>13 employment position?</p> <p>14 A. Acting Controller.</p> <p>15 Q. What did you do as the Senior</p> <p>16 Account Manager?</p> <p>17 A. I oversaw the payroll AP clerk, I</p> <p>18 created journal entries, I did bank</p> <p>19 reconciliations.</p> <p>20 Q. Okay. And to your second position,</p> <p>21 what did you do under that position?</p> <p>22 A. I then oversaw the staff accountants</p>	<p style="text-align: right;">Page 15</p> <p>1 A. What I am aware of is that I signed</p> <p>2 an agreement indicating that I gave them</p> <p>3 permission to review my credit.</p> <p>4 Q. And are you aware of them ever</p> <p>5 checking your credit score?</p> <p>6 A. I can't speak to what the HR</p> <p>7 department does. All I can say is that I've</p> <p>8 given them permission to do so.</p> <p>9 Q. Are you personally aware of your</p> <p>10 employer ever checking your credit score?</p> <p>11 MR. GOLDSOON: Objection.</p> <p>12 MR. METCHO: On what basis?</p> <p>13 MR. GOLDSOON: Asked and answered.</p> <p>14 MR. METCHO: I don't believe the</p> <p>15 question was answered. You can --</p> <p>16 The objection is noted on the</p> <p>17 record.</p> <p>18 You can answer the question if</p> <p>19 you're able.</p> <p>20 THE WITNESS: Can you repeat the</p> <p>21 question.</p> <p>22 BY MR. METCHO:</p>
<p style="text-align: right;">Page 14</p> <p>1 and the senior accountants when they were</p> <p>2 there, and issued the financial statements.</p> <p>3 Q. And I'm a bit confused about you've</p> <p>4 stated several times "issuing financial</p> <p>5 statements". Can you delve a little bit more</p> <p>6 into that. What that actually entails.</p> <p>7 A. Preparing financial statements for</p> <p>8 the CFO to review.</p> <p>9 Q. And what type of information is in</p> <p>10 these financial statements?</p> <p>11 A. Information that you would find on a</p> <p>12 balance sheet, income statement, cash flow.</p> <p>13 Q. How often do you prepare them?</p> <p>14 A. Monthly.</p> <p>15 Q. Does your employer check your credit</p> <p>16 score regularly?</p> <p>17 A. I can't answer that question. I</p> <p>18 don't --</p> <p>19 I'm not privy to what HR does on a</p> <p>20 regular basis.</p> <p>21 Q. Are you aware of your employer ever</p> <p>22 checking your credit score?</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Sure. Are you personally aware of</p> <p>2 your employer ever checking your credit score?</p> <p>3 A. That is a question I cannot answer.</p> <p>4 I do not work in the HR department.</p> <p>5 Q. Are you aware of your employer</p> <p>6 having a policy and procedure in place</p> <p>7 regarding checking your credit score or your</p> <p>8 credit reputation?</p> <p>9 A. I cannot speak to the policies of</p> <p>10 HR. What I can speak to is that upon</p> <p>11 employment I gave them --</p> <p>12 -- I signed a document, gave them</p> <p>13 permission.</p> <p>14 Q. Permission for what?</p> <p>15 A. To access necessary information,</p> <p>16 including my background check.</p> <p>17 Q. Do you have this documentation?</p> <p>18 A. No, I do not.</p> <p>19 Q. Do you know who has the</p> <p>20 documentation? Does your employer have this</p> <p>21 documentation?</p> <p>22 MR. GOLDSOON: Objection.</p>

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<p style="text-align: right;">Page 17</p> <p>1 MR. METCHO: On what basis?</p> <p>2 MR. GOLDSON: You're asking her a</p> <p>3 question about another entity, not a personal</p> <p>4 knowledge.</p> <p>5 MR. METCHO: We're in Federal Court.</p> <p>6 There are two objections. There's one to</p> <p>7 privilege, and this is not a privileged matter.</p> <p>8 MR. GOLDSON: Uh-huh.</p> <p>9 MR. METCHO: So again, I'll note the</p> <p>10 objection for the record.</p> <p>11 You can answer if you're able.</p> <p>12 THE WITNESS: Can you repeat the</p> <p>13 question.</p> <p>14 BY MR. METCHO:</p> <p>15 Q. Sure. Are you aware of your</p> <p>16 employer having a policy and procedure in place</p> <p>17 regarding the checking of your credit score?</p> <p>18 A. I don't have enough information to</p> <p>19 answer that question. What I can say is that</p> <p>20 upon hiring I filled out a document indicating</p> <p>21 that I gave them permission to do a background</p> <p>22 check.</p>	<p style="text-align: right;">Page 19</p> <p>1 the option to see, so I clicked.</p> <p>2 Q. How often do you do that?</p> <p>3 A. It depends.</p> <p>4 Q. When was the last time prior to that</p> <p>5 that you checked your credit score?</p> <p>6 A. I can't give you a definitive date.</p> <p>7 Q. Do you have an approximate date?</p> <p>8 A. Approximately --</p> <p>9 Approximately a month prior.</p> <p>10 Q. When was the last time you applied</p> <p>11 for credit?</p> <p>12 A. I can't recall.</p> <p>13 Q. How many credit cards do you have?</p> <p>14 A. I have three personal credit cards.</p> <p>15 Q. Who are the credit cards with?</p> <p>16 A. Chase, um, Barclay, and Sealy's</p> <p>17 Furniture something. S-E-L-E-Y, I believe.</p> <p>18 Q. Do you have balances on these cards?</p> <p>19 A. One.</p> <p>20 Q. What's the current balance on the</p> <p>21 Chase card?</p> <p>22 A. Zero.</p>
<p style="text-align: right;">Page 18</p> <p>1 Q. What did the background check</p> <p>2 entail?</p> <p>3 A. I can't speak to that. All I know</p> <p>4 is that I had to fill out information</p> <p>5 indicating that they could access my</p> <p>6 information. I provided my Social Security</p> <p>7 Number.</p> <p>8 Q. When is the last time you checked</p> <p>9 your credit score?</p> <p>10 A. The last time I checked my credit</p> <p>11 score probably was maybe a couple weeks ago.</p> <p>12 Q. Why did you check it?</p> <p>13 A. Why did I check my credit score?</p> <p>14 Q. Yeah.</p> <p>15 A. Because it was an option on my</p> <p>16 credit reporting.</p> <p>17 Q. Option on your credit reporting?</p> <p>18 A. Yes.</p> <p>19 Q. What does that mean?</p> <p>20 A. That means that when I log into my</p> <p>21 financial information they let me know if</p> <p>22 there's any changes to my credit, and I have</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Barclay's card?</p> <p>2 A. Zero.</p> <p>3 Q. The Sealy's card?</p> <p>4 A. No. I'm sorry. Sealy's --</p> <p>5 -- or Barclay's about maybe 7200.</p> <p>6 Q. What are your monthly payments on</p> <p>7 the Sealy's card?</p> <p>8 A. The Sealy's is paid for. It doesn't</p> <p>9 have a balance.</p> <p>10 Q. Okay. Which account do you have a</p> <p>11 balance on?</p> <p>12 A. Barclay.</p> <p>13 Q. Okay. The Barclay's account. When</p> <p>14 is the last time you made a payment?</p> <p>15 A. Maybe a week and a half ago.</p> <p>16 Q. And how much was the payment for?</p> <p>17 A. \$500.</p> <p>18 Q. Do you make monthly payments?</p> <p>19 A. I do.</p> <p>20 Q. How do you pay it? Do you pay it</p> <p>21 online? Do you pay it by check?</p> <p>22 A. I pay it online through my banking</p>

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<p style="text-align: right;">Page 21</p> <p>1 institution.</p> <p>2 Q. Okay. Do you have student loans?</p> <p>3 A. I do.</p> <p>4 Q. Approximately how much are your</p> <p>5 student loans that are outstanding?</p> <p>6 A. Collectively I would say about</p> <p>7 63,000.</p> <p>8 Q. Do you pay those monthly?</p> <p>9 A. I do.</p> <p>10 Q. How much do you pay a month?</p> <p>11 A. Collectively about 500 bucks.</p> <p>12 Q. When you say "collectively", does</p> <p>13 that mean that you have multiple lenders for</p> <p>14 your student loans? Or are they through one</p> <p>15 entity?</p> <p>16 A. They're two lenders. Yes.</p> <p>17 Q. Who are the lenders?</p> <p>18 A. Um, let's see. Navient. And what</p> <p>19 is the other one?</p> <p>20 I can't think of the name.</p> <p>21 Q. Okay. In your allegations in your</p> <p>22 complaint you allege that you deal with</p>	<p style="text-align: right;">Page 23</p> <p>1 good character, is also a reflection of your</p> <p>2 credit. So when I completed, signed the form</p> <p>3 for the background check, that is my</p> <p>4 understanding that that is how they measure.</p> <p>5 Q. Have you ever discussed your credit</p> <p>6 history with your employer?</p> <p>7 A. No.</p> <p>8 Q. Has your employer ever questioned</p> <p>9 your credit history?</p> <p>10 A. No.</p> <p>11 Q. Has your employer ever questioned</p> <p>12 your financial reputation?</p> <p>13 A. Define --</p> <p>14 Can you define "questioned".</p> <p>15 Q. Sure. I'll break it down to an even</p> <p>16 easier question. Has your employer ever asked</p> <p>17 you any questions regarding your financial</p> <p>18 background?</p> <p>19 A. I'm going to say "yes", because I</p> <p>20 believe that's covered under the background</p> <p>21 check. That's where they would have inquired.</p> <p>22 Q. Okay. When did this occur?</p>
<p style="text-align: right;">Page 22</p> <p>1 millions of dollars of transactions. Can you</p> <p>2 describe that for me, please.</p> <p>3 A. I oversee millions of dollars of</p> <p>4 transactions.</p> <p>5 Q. What does that mean?</p> <p>6 A. That means that I deal with a high</p> <p>7 volume of revenue in which I have access to and</p> <p>8 which I record and which I make payments from</p> <p>9 on behalf of the company I work for.</p> <p>10 Q. And you also state in your</p> <p>11 allegations that your employer requires good</p> <p>12 credit and a solid financial reputation. How</p> <p>13 often or by what measure does your employer</p> <p>14 require you to have good credit?</p> <p>15 A. Can you repeat the question.</p> <p>16 Q. Sure. Again, your allegations state</p> <p>17 that your employer requires good credit and a</p> <p>18 solid financial reputation. How does your</p> <p>19 employer judge your good credit?</p> <p>20 A. What I can say is that my position</p> <p>21 requires a great deal of trust, and working in</p> <p>22 the field of finance your reputation, as far as</p>	<p style="text-align: right;">Page 24</p> <p>1 A. When I was hired.</p> <p>2 Q. And what did they ask you?</p> <p>3 A. They asked me to complete the</p> <p>4 document giving permission to do a full</p> <p>5 background investigation on me. I had to</p> <p>6 include my Social Security Number.</p> <p>7 Q. Did you ever receive any feedback</p> <p>8 from this particular background investigation?</p> <p>9 (Witness nodded.)</p> <p>10 Can you answer "yes" or "no",</p> <p>11 please.</p> <p>12 A. Not to my knowledge. Not that I can</p> <p>13 recall.</p> <p>14 Q. Did anyone ever discuss your</p> <p>15 financial history with you at your place of</p> <p>16 employment?</p> <p>17 A. No.</p> <p>18 Q. Are you aware of your employer</p> <p>19 checking your credit at any time between</p> <p>20 November of 2016 and May of 2017?</p> <p>21 MR. GOLDSON: Objection.</p> <p>22 MR. METCHO: On what basis?</p>

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<p style="text-align: right;">Page 25</p> <p>1 MR. GOLDSON: Asked and answered.</p> <p>2 MR. METCHO: Objection noted. You</p> <p>3 can answer the question if you're able.</p> <p>4 THE WITNESS: Can you repeat the</p> <p>5 question.</p> <p>6 BY MR. METCHO:</p> <p>7 Q. Sure. Are you aware of any time</p> <p>8 between November of 2016 and May of 2017 of</p> <p>9 your employer checking your credit score?</p> <p>10 A. I'm not aware of what HR does. I</p> <p>11 cannot speak to the fact if they did or didn't.</p> <p>12 I can just speak to the fact that I've given</p> <p>13 them permission to do so.</p> <p>14 Q. So again, I'm the attorney for the</p> <p>15 defendant in this matter, Ability Recovery</p> <p>16 Services. Do you recall speaking with Ability</p> <p>17 Recovery Services regarding any accounts?</p> <p>18 A. I do.</p> <p>19 Q. When was the first time you spoke</p> <p>20 with Ability?</p> <p>21 A. The first time I spoke with them was</p> <p>22 in 2016. I think it was either --</p>	<p style="text-align: right;">Page 27</p> <p>1 Q. Do you remember what you discussed?</p> <p>2 A. I do.</p> <p>3 Q. Can you give me a summary of what</p> <p>4 was discussed during the phone call.</p> <p>5 A. Sure. What was discussed was the</p> <p>6 information on the collection letter that they</p> <p>7 sent. The letter summarized, indicated that</p> <p>8 they had received this debt and that I needed</p> <p>9 to respond within 30 days. If they hadn't</p> <p>10 heard from me, they were going to assume that</p> <p>11 it was mine, and that if it wasn't I should</p> <p>12 reach out to them to clear up the matter. So I</p> <p>13 called.</p> <p>14 Q. Do you recall receiving any letters</p> <p>15 from Ability?</p> <p>16 A. The two letters that I got in the</p> <p>17 mail.</p> <p>18 Q. Okay. When was the date of the</p> <p>19 first letter? Do you remember approximately?</p> <p>20 A. I believe they were in --</p> <p>21 I believe they were 4 November 2016.</p> <p>22 And I remember, I say that specifically,</p>
<p style="text-align: right;">Page 26</p> <p>1 I think it was November of 2016.</p> <p>2 Q. Did you contact Ability? Or did</p> <p>3 Ability contact you?</p> <p>4 A. How do you define "contact"?</p> <p>5 Q. Did you call Ability? Did Ability</p> <p>6 call you? What was the initiation of the</p> <p>7 contact with Ability?</p> <p>8 A. Ability sent me two letters.</p> <p>9 Q. Okay.</p> <p>10 A. I called in reference to letters I</p> <p>11 received.</p> <p>12 Q. Do you remember approximately when</p> <p>13 you called Ability?</p> <p>14 A. I do.</p> <p>15 Q. When was it?</p> <p>16 A. It was the --</p> <p>17 I believe it was in the middle of --</p> <p>18 It was in the middle of December of</p> <p>19 2016.</p> <p>20 Q. Do you remember who you spoke with?</p> <p>21 A. I don't remember the gentleman's</p> <p>22 name.</p>	<p style="text-align: right;">Page 28</p> <p>1 because I knew I had 30 days, which is why I</p> <p>2 called quickly because I don't think I looked</p> <p>3 at it until December.</p> <p>4 Q. Okay. When you received that first</p> <p>5 letter did you send any letters back to</p> <p>6 Ability?</p> <p>7 A. I sent no letters to Ability.</p> <p>8 Q. Okay. So at no point did you send a</p> <p>9 letter to Ability disputing the debt?</p> <p>10 A. No, I did not send them a letter to</p> <p>11 dispute the debt. The letter indicated to</p> <p>12 call, so that's what I did. I called to</p> <p>13 dispute the debt.</p> <p>14 Q. Did you send a letter to Ability to</p> <p>15 request verification of the debt?</p> <p>16 A. I did not send a letter to Ability</p> <p>17 about the debt at all. I called per what the</p> <p>18 letter instructed.</p> <p>19 Q. Okay. After receiving the letter</p> <p>20 from Ability did you reach out to the credit</p> <p>21 bureaus?</p> <p>22 A. I did.</p>

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<p style="text-align: right;">Page 29</p> <p>1 Q. When was this?</p> <p>2 A. It was after the phone call in which</p> <p>3 after indicating that none of the items on the</p> <p>4 letter had anything to do with me, not the</p> <p>5 Social Security Number, not the date of birth.</p> <p>6 The gentleman then indicated that --</p> <p>7 Q. The gentleman from who? The credit</p> <p>8 bureaus?</p> <p>9 A. The gentleman from Ability that I</p> <p>10 spoke to on the phone.</p> <p>11 After talking to him, I said: I got</p> <p>12 this letter.</p> <p>13 He said, you know, they weren't sure</p> <p>14 if it was mine. They needed to confirm that it</p> <p>15 was. I said it wasn't. He mentioned a name.</p> <p>16 It wasn't mine. He mentioned a date of birth,</p> <p>17 it wasn't mine. He mentioned dependents, I</p> <p>18 told him I have none. I thought the matter was</p> <p>19 settled. He then indicated that he was going</p> <p>20 to report it to the credit bureau. I asked:</p> <p>21 How is that possible when the letter indicated</p> <p>22 that you got this information, you need to</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. My apologies. And let me try to</p> <p>2 break it down for you.</p> <p>3 A. Great.</p> <p>4 Q. So you had this conversation with</p> <p>5 Ability regarding the debt and you allegedly</p> <p>6 not owing the debt, right?</p> <p>7 A. That is correct.</p> <p>8 Q. Okay. At this point did you send</p> <p>9 any documentation to Ability regarding the</p> <p>10 debt?</p> <p>11 A. I wasn't requested to do any of</p> <p>12 those things, so the answer to that question is</p> <p>13 "no". I did not send them a letter. I think I</p> <p>14 said that before. That was not the --</p> <p>15 The nature of the letter was to give</p> <p>16 me instructions on how I was to dispute this</p> <p>17 debt. I followed the letter. They said to</p> <p>18 call. I called. I talked to a gentleman. He</p> <p>19 shared some information to confirm that this</p> <p>20 was the same person. None of the information</p> <p>21 he shared could confirm this was me. I thought</p> <p>22 it was done. He then told me that he was going</p>
<p style="text-align: right;">Page 30</p> <p>1 confirm if it was correct. I'm confirming that</p> <p>2 it's incorrect.</p> <p>3 He indicated that he would still</p> <p>4 report it to the credit bureaus.</p> <p>5 Q. Report it how? As disputed?</p> <p>6 A. He said he would report it as if it</p> <p>7 was my debt, and I had --</p> <p>8 It was my responsibility to go to</p> <p>9 the credit bureaus to defend myself.</p> <p>10 Q. Okay. Now, prior the this time,</p> <p>11 again, no documentation was sent by you to</p> <p>12 either Ability or Pendrick or the credit</p> <p>13 bureaus?</p> <p>14 A. I'm sorry. You have to repeat that.</p> <p>15 Q. Prior to this conversation with</p> <p>16 Ability, after you had received the letters</p> <p>17 from Ability --</p> <p>18 A. Okay.</p> <p>19 Q. -- did you send any documentation to</p> <p>20 Ability to Pendrick or to the credit bureaus?</p> <p>21 A. You're going to need to separate</p> <p>22 those questions because it's confusing.</p>	<p style="text-align: right;">Page 32</p> <p>1 to send it to --</p> <p>2 He said he still was going to report</p> <p>3 it on my credit. So I'm confused about how we</p> <p>4 got to this place because the letter indicated</p> <p>5 that calling and not being able to confirm the</p> <p>6 data was how you dispute it.</p> <p>7 Q. At this point did you check your</p> <p>8 credit report?</p> <p>9 A. I believe I did check after the</p> <p>10 call.</p> <p>11 Q. When was that?</p> <p>12 A. That was in December 2016.</p> <p>13 Q. And was there any indication on your</p> <p>14 credit report of any information being reported</p> <p>15 by Ability?</p> <p>16 A. Not at the time of the call.</p> <p>17 Q. Okay. When was the first time that</p> <p>18 you checked your credit report when you saw</p> <p>19 information that was being report by Ability?</p> <p>20 A. When I got a credit alert from my --</p> <p>21 There's a --</p> <p>22 I forget what you call it, but it's</p>

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<p style="text-align: right;">Page 33</p> <p>1 a credit protection agency that kind of let's</p> <p>2 you keep you alert of when things change in</p> <p>3 your credit. And as per the conversation I had</p> <p>4 with the gentleman from Ability, he did report</p> <p>5 it and it did show up as me owing the debt.</p> <p>6 Q. When did you sign up for that</p> <p>7 particular service?</p> <p>8 A. I've had it for over --</p> <p>9 At that time over 2 years.</p> <p>10 Q. How often do you receive</p> <p>11 notifications from that service?</p> <p>12 A. Anytime there's changes to my</p> <p>13 credit.</p> <p>14 Q. Why did you sign up for it?</p> <p>15 A. I can't recall my thinking at the</p> <p>16 time, but I believe there was --</p> <p>17 I don't know. I thought that was a</p> <p>18 good thing to do at the time.</p> <p>19 Q. Do you pay for it?</p> <p>20 A. I do.</p> <p>21 Q. Okay. When was the last time you</p> <p>22 made a payment for the service?</p>	<p style="text-align: right;">Page 35</p> <p>1 You can answer if you're able.</p> <p>2 THE WITNESS: Can you repeat the</p> <p>3 question.</p> <p>4 BY MR. METCHO:</p> <p>5 Q. Sure. Between November 2016 and May</p> <p>6 of 2017 did you have any discussions with</p> <p>7 anyone at your place of employment regarding</p> <p>8 your credit history?</p> <p>9 A. No.</p> <p>10 Q. Between November 2016 and May of</p> <p>11 2017 were you denied any credit opportunities?</p> <p>12 A. State that question again.</p> <p>13 Q. Sure. Between November of 2016 and</p> <p>14 May of 2017 were you denied any credit</p> <p>15 opportunities? For instance, did you attempt</p> <p>16 to open up a credit card and were denied? Or</p> <p>17 did you attempt to get a car loan and were</p> <p>18 denied? Anything of that nature?</p> <p>19 A. From November to December I would</p> <p>20 say "no". January 2017 when this showed up on</p> <p>21 my credit I became very concerned about it</p> <p>22 being there: One, because it was inaccurate,</p>
<p style="text-align: right;">Page 34</p> <p>1 A. I can't recall.</p> <p>2 Q. Do you still maintain the service?</p> <p>3 A. I do maintain the service.</p> <p>4 Q. Are you aware of any time that your</p> <p>5 employer noticed information on your credit</p> <p>6 report that was being reported by Ability?</p> <p>7 A. I cannot speak to what my job saw</p> <p>8 that as --</p> <p>9 I'm not privy to that information.</p> <p>10 Q. Were you ever --</p> <p>11 Between November of 2016 and May of</p> <p>12 2017 were you reprimanded by your employer</p> <p>13 regarding your credit history?</p> <p>14 A. I have never been reprimanded by my</p> <p>15 employer.</p> <p>16 Q. Between November of 2016 and May of</p> <p>17 2017 did you speak with anyone at your place of</p> <p>18 employment regarding your credit history?</p> <p>19 A. I think you asked that already.</p> <p>20 Q. I'm asking again.</p> <p>21 MR. GOLDSON: Objection.</p> <p>22 MR. METCHO: Noted.</p>	<p style="text-align: right;">Page 36</p> <p>1 and I knew how important my credit is.</p> <p>2 At that point I can't say that I</p> <p>3 applied for any credit, but I didn't go out of</p> <p>4 my way to make any decisions relating to my</p> <p>5 credit at that time because I believed that it</p> <p>6 was something small that we'd eventually get</p> <p>7 past it and it wouldn't be an issue.</p> <p>8 I don't know if that answers your</p> <p>9 question.</p> <p>10 Q. Do you remember how much the debt</p> <p>11 was for?</p> <p>12 A. I think it was \$1500 --</p> <p>13 Q. Okay.</p> <p>14 A. -- or so. Give or take.</p> <p>15 Q. Do you own a car?</p> <p>16 A. I do.</p> <p>17 Q. What kind of car do you own?</p> <p>18 A. A Saturn.</p> <p>19 Q. When was the last time you made a</p> <p>20 payment towards the note on the car?</p> <p>21 A. I paid for my car in cash. There</p> <p>22 was never a note on it.</p>

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<p style="text-align: right;">Page 37</p> <p>1 Q. Okay. So you don't have a car</p> <p>2 payment, in other words?</p> <p>3 A. I do not.</p> <p>4 Q. Um, between -- it's a small</p> <p>5 timeframe -- but November of 2016 and May of</p> <p>6 2017 did you seek any credit? Did you seek to</p> <p>7 open up a credit card? Did you seek an auto</p> <p>8 loan? Or anything of that sort?</p> <p>9 A. I considered purchasing a new car,</p> <p>10 but did not due to this particular inaccurate</p> <p>11 information on my credit.</p> <p>12 Q. When was that?</p> <p>13 A. It was around my birthday.</p> <p>14 Q. Which was when?</p> <p>15 A. March 13.</p> <p>16 Q. Did you still have the same car?</p> <p>17 A. I do.</p> <p>18 Q. And when did you purchase that car?</p> <p>19 A. I purchased that car, I think it was</p> <p>20 2000 --</p> <p>21 March of 2016, I believe.</p> <p>22 Q. Okay. And still to this day --</p>	<p style="text-align: right;">Page 39</p> <p>1 Q. And just give me a brief description</p> <p>2 of what was discussed during that call.</p> <p>3 MR. GOLDSOON: Objection. I thought</p> <p>4 this was asked and answered.</p> <p>5 MR. METCHO: Okay. I just --</p> <p>6 Again, I'm just trying to get some</p> <p>7 background information.</p> <p>8 MR. GOLDSOON: Just for the record.</p> <p>9 MR. METCHO: That's fine.</p> <p>10 You can answer if you're able.</p> <p>11 THE WITNESS: Will you repeat the</p> <p>12 question.</p> <p>13 BY MR. METCHO:</p> <p>14 Q. Sure. When you spoke with Ability</p> <p>15 in December of 2016 regarding the account and</p> <p>16 you allegedly not being responsible for the</p> <p>17 account, what was discussed?</p> <p>18 Take your time.</p> <p>19 A. Yeah, that's correct.</p> <p>20 Sure. What was discussed?</p> <p>21 We discussed the fact that I</p> <p>22 received two letters from them indicating that</p>
<p style="text-align: right;">Page 38</p> <p>1 we're now in February of 2018 -- you still have</p> <p>2 the same car?</p> <p>3 A. I do.</p> <p>4 Q. You did not attempt to purchase</p> <p>5 another car?</p> <p>6 A. Not until this had been resolved.</p> <p>7 MR. GOLDSOON: Just real quick, I'm</p> <p>8 going to need to take a really short break</p> <p>9 sometime soon, just whenever is good for you</p> <p>10 within the next like 10 or so minutes.</p> <p>11 MR. METCHO: We can take a break now</p> <p>12 if you want.</p> <p>13 (Recess taken at 1:34 p.m.)</p> <p>14 (Deposition resumed at 1:43 p.m.)</p> <p>15 BY MR. METCHO:</p> <p>16 Q. Ms. Long, do you remember the first</p> <p>17 time you made a dispute to Ability regarding</p> <p>18 the account? In other words, when was the</p> <p>19 first time you told Ability that you weren't</p> <p>20 responsible for this particular account?</p> <p>21 A. When I made the phone call in</p> <p>22 December.</p>	<p style="text-align: right;">Page 40</p> <p>1 there was --</p> <p>2 -- they received information</p> <p>3 indicating this was my debt, from their</p> <p>4 information that this belonged to me and that</p> <p>5 for me to confirm. In doing so, I was to call.</p> <p>6 And if they hadn't heard from me in 30 days</p> <p>7 they would assume that it was mine. So I got</p> <p>8 on the phone, I called them, I said: Hey, I</p> <p>9 got this letter. This isn't mine.</p> <p>10 They said: Okay.</p> <p>11 They asked me to indicate the</p> <p>12 reference number. I gave the reference number.</p> <p>13 Then the gentleman asked follow-up questions:</p> <p>14 You know, they mentioned a date of birth, it</p> <p>15 wasn't mine; they mentioned a name, it wasn't</p> <p>16 mine; they mentioned dependents -- I think two</p> <p>17 different names -- I said I don't have any</p> <p>18 dependents; they said okay.</p> <p>19 Then the gentleman indicated that I</p> <p>20 would have to take this up with the credit</p> <p>21 agency. I was perplexed. I said: Wait. I</p> <p>22 called you within the timeframe to tell you it</p>

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<p style="text-align: right;">Page 41</p> <p>1 wasn't mine. All of the supporting 2 documentation that you've given me that you 3 have that you are -- 4 -- what you're saying are 5 identifiers, I said they're not. I don't -- 6 they're not my name, my date of birth, I don't 7 have any children. 8 He then told me that I would have to 9 take it up with the credit reporting agency. I 10 then was confused. I asked him to clarify: 11 How was that possible when your letter stated 12 that you got this information, call to confirm, 13 I told you this isn't mine. How can you still 14 report it on my credit when all you have is my 15 name and my address, but none of the other 16 information relates to that? 17 He then said that he couldn't get 18 into that, that my only recourse now was to 19 take it up with my credit agency. We went back 20 and forth. He continued to say the same thing, 21 so I said: Okay. 22 And the next month I got an alert,</p>	<p style="text-align: right;">Page 43</p> <p>1 information being furnished by Ability? 2 A. I don't understand your question. 3 Q. All right. Let me step back. 4 When was the first time you 5 recognized that Ability was furnishing 6 information to the credit bureaus regarding the 7 account at issue? 8 A. When I got an alert. 9 Q. Do you remember when that was? 10 A. It was in -- 11 It was in like a month later. In 12 January 2017. 13 Q. Okay. And when was the last time 14 you checked your credit report and saw that 15 there was information being furnished by 16 Ability? 17 A. When was the last time that I saw -- 18 I'm still not understanding what 19 you're asking. 20 Q. Okay. Let me try to rephrase it. 21 When was the last time you checked 22 your credit report and saw on your credit</p>
<p style="text-align: right;">Page 42</p> <p>1 checked my credit. The liability that I called 2 him earlier before is now on my credit. 3 Q. After that conversation did you have 4 any further conversations with Ability? 5 A. I did not. 6 Q. Did you receive any additional 7 letters from Ability? 8 A. I did not. 9 Q. After that conversation did you 10 contact the credit bureaus? 11 A. I disputed it using, I think it was 12 Experian. Their site says they will send my 13 dispute to all the other agencies. So that's 14 what I did. 15 Q. What happened as a result of that? 16 A. They sent me correspondence, I think 17 it was via -- 18 You had to go back to the site and 19 it indicated they had indicated this was my 20 debt. 21 Q. When was the last time you checked 22 your credit report when you saw that there was</p>	<p style="text-align: right;">Page 44</p> <p>1 report that there was information that was 2 being furnished by Ability? 3 A. Sometime in September in the Fall. 4 Q. Of what year? 5 A. 2017. 6 Q. Okay. When was the last time you 7 checked your credit report? 8 A. A couple weeks ago, a week and a 9 half ago. 10 Q. Is there still information being 11 furnished by Ability? 12 A. No. 13 Q. So you have referenced earlier that 14 when you began your employment you had filled 15 out some type of documentation more or less 16 giving your employer the ability to check your 17 credit history, correct? 18 A. I said that they had -- 19 I gave them permission to do a 20 background check. 21 Q. Can you describe this particular 22 documentation for me.</p>

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<p style="text-align: right;">Page 45</p> <p>1 A. It's a sheet that says you give them</p> <p>2 permission --</p> <p>3 You fill out your address, your</p> <p>4 Social Security Number, and they're saying</p> <p>5 you're giving us permission to run a background</p> <p>6 check on you.</p> <p>7 Q. After filling out this documentation</p> <p>8 did you receive any feedback from your</p> <p>9 employer?</p> <p>10 MR. GOLDSON: Objection.</p> <p>11 MR. METCHO: Basis?</p> <p>12 MR. GOLDSON: Asked and answered.</p> <p>13 MR. METCHO: Objection noted.</p> <p>14 You can answer if you're able.</p> <p>15 THE WITNESS: I was hired.</p> <p>16 BY MR. METCHO:</p> <p>17 Q. Okay. How long have you been at --</p> <p>18 And again, I may have asked this.</p> <p>19 Just to refresh my memory, how long have you</p> <p>20 been at your current place of employment?</p> <p>21 A. A year and 5 months.</p> <p>22 Q. During that time period have you</p>	<p style="text-align: right;">Page 47</p> <p>1 positions?</p> <p>2 A. I got an official promotion in</p> <p>3 September of 2017.</p> <p>4 Q. Did this particular position come</p> <p>5 with a salary increase?</p> <p>6 A. It did.</p> <p>7 Q. Have you received salary increases</p> <p>8 throughout your employment?</p> <p>9 A. Yes.</p> <p>10 Q. When was the last time you received</p> <p>11 a salary increase?</p> <p>12 A. September 2017.</p> <p>13 Q. So you allege in your complaint that</p> <p>14 you were leery of potentially losing your job</p> <p>15 over this trade line information that was being</p> <p>16 reported. Is that correct?</p> <p>17 A. Repeat the question.</p> <p>18 Q. Sure. You allege in your</p> <p>19 complaint --</p> <p>20 Here, I can actually bring the</p> <p>21 document up. I can read it to you verbatim.</p> <p>22 In Paragraph 57 you state that: You suffered</p>
<p style="text-align: right;">Page 46</p> <p>1 been reprimanded in any way?</p> <p>2 MR. GOLDSON: Objection.</p> <p>3 MR. METCHO: Basis?</p> <p>4 MR. GOLDSON: Asked and answered.</p> <p>5 MR. METCHO: You can --</p> <p>6 Objection noted.</p> <p>7 You can answer if you're able.</p> <p>8 THE WITNESS: No.</p> <p>9 BY MR. METCHO:</p> <p>10 Q. During this particular time period</p> <p>11 have you been promoted?</p> <p>12 A. During what time period?</p> <p>13 Q. Throughout your employment?</p> <p>14 A. Employment where?</p> <p>15 Q. At your current place of employment.</p> <p>16 A. Yes.</p> <p>17 Q. How many times?</p> <p>18 A. Once.</p> <p>19 Q. When was --</p> <p>20 When did that occur?</p> <p>21 A. Define "promotion".</p> <p>22 Q. Did you obtain different employment</p>	<p style="text-align: right;">Page 48</p> <p>1 actual damages, economic damages, and damages</p> <p>2 regarding credit damage, anxiety,</p> <p>3 sleeplessness, emotional distress from the</p> <p>4 prospect of job loss.</p> <p>5 What made you think that you were</p> <p>6 going to lose your job over this?</p> <p>7 MR. GOLDSON: Objection.</p> <p>8 MR. METCHO: Basis?</p> <p>9 MR. GOLDSON: Form.</p> <p>10 MR. METCHO: You can answer if</p> <p>11 you're able.</p> <p>12 THE WITNESS: Repeat the question.</p> <p>13 BY MR. METCHO:</p> <p>14 Q. Sure. In Paragraph 57 you state</p> <p>15 that you suffered actual damages, and one of</p> <p>16 these damages included a prospect of job loss.</p> <p>17 What made you think that Ability's attempt to</p> <p>18 recover this debt was going to lead to you</p> <p>19 losing your job?</p> <p>20 A. When I was hired my background</p> <p>21 information presented a different version than</p> <p>22 what this trade line was now representing.</p>

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<p style="text-align: right;">Page 49</p> <p>1 This trade line was representing that I was 2 irresponsible, I owed a debt and did not pay. 3 And all of that is inaccurate. 4 Q. Are you aware of anyone at your 5 place of employment seeing this particular 6 trade line being reported? 7 A. What I can speak to is that when I 8 was hired I had given them permission to do a 9 background check, I provided my Social Security 10 Number. 11 Q. Did anyone at your place of 12 employment bring this trade line information 13 that was being reported by Ability to your 14 attention at any time? 15 A. No. 16 Q. Did you lose your job? 17 A. No. 18 Q. You also allege in Paragraph 57 that 19 you had fear of hard earned money being taken 20 away from you, although you just testified 21 under oath that you received a promotion in 22 2017?</p>	<p style="text-align: right;">Page 51</p> <p>1 was furnishing on your credit report regarding 2 the debt, are you aware of anyone else seeing 3 this information? 4 A. What I can speak to is that anyone 5 who had access to, who had regular access to my 6 credit report could in fact see it. 7 Q. Are you aware of anyone seeing it? 8 A. I'm aware of them having the ability 9 to access and see it. 10 Q. But are you aware of anyone seeing 11 it? 12 A. I'm aware of them having the access 13 to see. I can't speak to what other people do. 14 Q. It's a "yes" or "no" question. 15 A. I can speak to them having the 16 ability to access and see. 17 Q. Was it ever brought to your 18 attention that anyone saw this information on 19 your credit report regarding the debt that was 20 being reported by Ability? 21 A. Define "brought to my attention". 22 Q. I'm asking the questions, ma'am.</p>
<p style="text-align: right;">Page 50</p> <p>1 A. I received a promotion 2 September 2017. This was reported 3 January 2017. 4 Q. Okay. 5 A. So from that time to that time I had 6 no idea what could happen to me at that point. 7 Q. Did you have any money taken away 8 from you by your employer during that time 9 period? 10 A. Define "taken away". 11 Q. Was there a -- 12 Did you lose salary? Did your 13 salary decrease during that time period? 14 A. No, it did not. 15 Q. You have a claim in your 16 complaint -- if I can find the particular 17 paragraph -- it's Count 2 for defamation. Are 18 you aware of anyone other than yourself being 19 aware of this information that was being 20 furnished by Ability on your credit report? 21 A. Repeat the question. 22 Q. Sure. The information that Ability</p>	<p style="text-align: right;">Page 52</p> <p>1 A. I'm asking for clarity on the 2 question, sir. 3 MR. GOLDSON: Objection. 4 BY MR. METCHO: 5 Q. Okay. Was it ever brought to your 6 attention that anyone saw this information that 7 was being furnished by Ability on your credit 8 report? 9 A. I can speak to individuals having 10 access to see. 11 Q. Again, it's a "yes" or "no" 12 question. 13 A. I can speak to them having access to 14 see. 15 Q. Did they see it? 16 MR. GOLDSON: Objection. 17 MR. METCHO: Basis? 18 MR. GOLDSON: Asked and answered. 19 MR. METCHO: I didn't get an answer 20 to the question. 21 MR. GOLDSON: You've got plenty of 22 answers to the question.</p>

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<p style="text-align: right;">Page 53</p> <p>1 MR. METCHO: That's not an answer.</p> <p>2 It's a "yes" or "no" question.</p> <p>3 MR. GOLDSON: She's given her</p> <p>4 answer.</p> <p>5 MR. METCHO: It's not an answer.</p> <p>6 We'll issue additional written discovery on</p> <p>7 that question -- that's fine -- in the form of</p> <p>8 a request for admissions.</p> <p>9 BY MR. METCHO:</p> <p>10 Q. What types of economic damages did</p> <p>11 you suffer as a result of this collection</p> <p>12 activity?</p> <p>13 A. Well, one, it presented loss of</p> <p>14 opportunity.</p> <p>15 Q. What opportunities did you lose?</p> <p>16 A. Opportunities to purchase a new car</p> <p>17 and get a discounted credit rate because this</p> <p>18 is a derogatory information. If I had bought a</p> <p>19 car in 2016 it would be an issue. When I try</p> <p>20 to buy one in 2017 now I have the possibility</p> <p>21 of an increased interest rate that --</p> <p>22 Q. When did you try to purchase a car</p>	<p style="text-align: right;">Page 55</p> <p>1 if that's not what you meant, please clarify.</p> <p>2 Q. We'll move on. That's fine.</p> <p>3 What types of inconvenience did you</p> <p>4 suffer as a result of Ability attempting to</p> <p>5 recover this debt?</p> <p>6 A. Um, inconvenience of having to</p> <p>7 prolong a purchase of a car, the inconvenience</p> <p>8 of having the opportunity to refinance my house</p> <p>9 if I chose to, the inconvenience of having to</p> <p>10 freely move in the market without having to be</p> <p>11 concerned about what inaccurate reporting --</p> <p>12 -- what options it would leave me.</p> <p>13 Q. What do you mean by "options"?</p> <p>14 A. Relating to, for example, let's say</p> <p>15 buying a car. An interest rate of 1.5 or an</p> <p>16 interest rate of 5.7. Those are different</p> <p>17 options based on what I have consistently --</p> <p>18 I've done my very best to ensure</p> <p>19 that I pay my debts on time. That not only is</p> <p>20 a reflection of my financial responsibility,</p> <p>21 but my character. So when you're making</p> <p>22 financial decisions how they lend you money</p>
<p style="text-align: right;">Page 54</p> <p>1 in 2017?</p> <p>2 A. I spoke to --</p> <p>3 I was considering purchasing a car</p> <p>4 on my birthday, as you asked previously.</p> <p>5 Q. Okay.</p> <p>6 A. So you asked about economic damages.</p> <p>7 I see that as a missed opportunity because I am</p> <p>8 now in a holding pattern of not being able to</p> <p>9 make free economic decisions on my behalf</p> <p>10 because of inaccurate reporting.</p> <p>11 Q. But this is no longer being reported</p> <p>12 on your credit report, correct?</p> <p>13 A. As of a couple weeks ago, no, I</p> <p>14 didn't see it.</p> <p>15 Q. So what's keeping you from buying a</p> <p>16 car now?</p> <p>17 A. I haven't had the time. But I</p> <p>18 believe your question was during that</p> <p>19 timeframe. Did I misunderstand your question?</p> <p>20 Q. No, that's okay.</p> <p>21 A. That's what you were saying. I just</p> <p>22 want to make sure I'm answering correctly. So</p>	<p style="text-align: right;">Page 56</p> <p>1 depends on how you have previously handled</p> <p>2 money. And this information being reported is</p> <p>3 inaccurate about how I handle money.</p> <p>4 Q. Did you speak financing during that</p> <p>5 particular time period?</p> <p>6 A. As I spoke to the question earlier,</p> <p>7 I indicated once the information was furnished</p> <p>8 I held off on pursuing options hoping that this</p> <p>9 would be resolved quickly.</p> <p>10 Q. And it was resolved, correct?</p> <p>11 A. Define "resolved", because we're</p> <p>12 here today. So what do you mean by "resolved"?</p> <p>13 Q. It was taken off your credit report,</p> <p>14 correct?</p> <p>15 A. Yes, it was.</p> <p>16 Q. And when was that?</p> <p>17 A. I checked my credit report a couple</p> <p>18 of weeks ago, it was not there.</p> <p>19 Q. And since that particular date have</p> <p>20 you applied for any type of financing?</p> <p>21 A. Not as of yet.</p> <p>22 Q. You allege in your complaint that</p>

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<p style="text-align: right;">Page 57</p> <p>1 you had anxiety and sleeplessness. When was</p> <p>2 the last time you experienced these two</p> <p>3 attributes?</p> <p>4 A. Last night preparing before I came</p> <p>5 to this deposition.</p> <p>6 Q. What about prior to then?</p> <p>7 A. Let's see. It depends on how</p> <p>8 frequently I think about this.</p> <p>9 Q. Your counsel had earlier handed me</p> <p>10 this document, which I'll hand to the Court</p> <p>11 Reporter and we'll mark this as Exhibit A.</p> <p>12 (Exhibit 1 marked for</p> <p>13 identification.)</p> <p>14 Can you describe this document for</p> <p>15 me, please.</p> <p>16 A. Sure. It is a notification from</p> <p>17 Mint.</p> <p>18 Q. What's Mint?</p> <p>19 A. Mint is an app that I use to help</p> <p>20 manage my finances.</p> <p>21 Q. In what way?</p> <p>22 A. Maintains my budgets, as well as</p>	<p style="text-align: right;">Page 59</p> <p>1 have something to do with your balance on your</p> <p>2 Sealy's card?</p> <p>3 MR. GOLDSON: Objection.</p> <p>4 MR. METCHO: As to?</p> <p>5 MR. GOLDSON: Form.</p> <p>6 MR. METCHO: You can answer if</p> <p>7 you're able.</p> <p>8 THE WITNESS: Repeat the question.</p> <p>9 BY MR. METCHO:</p> <p>10 Q. Sure. Is it possible that this --</p> <p>11 -- you received this notification</p> <p>12 due to the balance that's on your Sealy's card?</p> <p>13 A. I can't speak to that. I don't</p> <p>14 know.</p> <p>15 Q. Are you currently content with your</p> <p>16 place of employment?</p> <p>17 A. Define "content".</p> <p>18 Q. Sure. Are you happy with your work?</p> <p>19 A. Yeah. I thoroughly enjoy my work.</p> <p>20 Q. Do you plan on staying there?</p> <p>21 A. Planning on staying? What's that</p> <p>22 mean?</p>
<p style="text-align: right;">Page 58</p> <p>1 savings goals, as well as they keep me</p> <p>2 up-to-date on my credit score change.</p> <p>3 Q. When did you obtain this document?</p> <p>4 A. I believe it was in the Fall of</p> <p>5 2017.</p> <p>6 Q. Why wasn't this document produced</p> <p>7 along with your discovery responses?</p> <p>8 A. I can't speak to the date when, but</p> <p>9 I know it was --</p> <p>10 It was in the Fall when I received</p> <p>11 it.</p> <p>12 Q. Is there a particular date on that</p> <p>13 document?</p> <p>14 A. Not from what I can see.</p> <p>15 Q. Does that document state exactly why</p> <p>16 your alleged interest rate went up?</p> <p>17 A. It does not state why, it just</p> <p>18 states that it did.</p> <p>19 Q. Had you applied for credit prior to</p> <p>20 when you received that document?</p> <p>21 A. Not that I can recall.</p> <p>22 Q. Could this particular notification</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. At your place of employment.</p> <p>2 A. I'm not ready to try to answer that</p> <p>3 10 years from now, 20 --</p> <p>4 I can't speak to --</p> <p>5 Q. Within the next year.</p> <p>6 A. I can't speak to what I plan to do</p> <p>7 in the future.</p> <p>8 Q. Did this particular account or</p> <p>9 Ability's attempt to recover the account have</p> <p>10 any effect whatsoever on your employment</p> <p>11 status?</p> <p>12 A. Repeat the question.</p> <p>13 Q. Sure. Ability's attempts to recover</p> <p>14 this debt obligation at issue, did it have any</p> <p>15 type of effect on your employment status?</p> <p>16 A. Ability's inaccurate reporting on my</p> <p>17 credit?</p> <p>18 MR. GOLDSON: Just, I'm going to put</p> <p>19 an objection on the record as to form.</p> <p>20 MR. METCHO: Okay. You can answer</p> <p>21 if you're able.</p> <p>22 THE WITNESS: Repeat the question.</p>

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<p style="text-align: right;">Page 61</p> <p>1 BY MR. METCHO:</p> <p>2 Q. Sure. Ability's attempt to recover</p> <p>3 the debt obligation at issue, did it have any</p> <p>4 type of effect on your employment?</p> <p>5 A. Ability's inaccurate reporting of</p> <p>6 the debt on my credit became an issue for me in</p> <p>7 the sense that when I was hired that was not</p> <p>8 the credit reflection or the background</p> <p>9 information they received and it was also</p> <p>10 inaccurate, and now it's being presented and it</p> <p>11 opened up to the possibility for an effect on</p> <p>12 how I was viewed and my ability to keep their</p> <p>13 trust in handling their money.</p> <p>14 Q. You're not aware of anybody at your</p> <p>15 place of employment seeing this information on</p> <p>16 your credit report, right?</p> <p>17 A. I can't speak to what they have done</p> <p>18 with it. I don't know.</p> <p>19 Q. And you had mentioned earlier that</p> <p>20 you've been getting salary raises throughout</p> <p>21 your employment, correct?</p> <p>22 A. I spoke that I had a promotion in</p>	<p style="text-align: right;">Page 63</p> <p>1 MR. METCHO: You can ask if you're</p> <p>2 able.</p> <p>3 You can answer if you're able.</p> <p>4 Excuse me.</p> <p>5 THE WITNESS: Repeat the question.</p> <p>6 BY MR. METCHO:</p> <p>7 Q. The information that --</p> <p>8 -- regarding Ability's attempt to</p> <p>9 collect a debt is no longer on your credit</p> <p>10 report, correct?</p> <p>11 A. From my understanding, yes.</p> <p>12 Q. Okay. Are you aware that probably</p> <p>13 about a week ago myself on behalf of both</p> <p>14 Ability and Pendrick had issued to your counsel</p> <p>15 what's called an Offer of Judgment Pursuant to</p> <p>16 Federal Rule of Civil Procedure 68?</p> <p>17 A. Am I aware of --</p> <p>18 Q. Were you aware of that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And it's still your position</p> <p>21 today that you're not going to accept the Offer</p> <p>22 of Judgment?</p>
<p style="text-align: right;">Page 62</p> <p>1 September of 2017.</p> <p>2 Q. So it hasn't taken away from your</p> <p>3 ability to work, correct?</p> <p>4 A. Repeat the question.</p> <p>5 Q. It hasn't taken away --</p> <p>6 Ability's attempts to recover the</p> <p>7 account at issue has not taken away from your</p> <p>8 ability to make a leaving to earn a salary,</p> <p>9 correct?</p> <p>10 A. It's inaccurate reporting has</p> <p>11 potentially threatened my ability to earn if I</p> <p>12 chose to leave my job as I would then be</p> <p>13 subject to the same background information, and</p> <p>14 this information would be inaccurate and it</p> <p>15 would be a reflection of my understanding of my</p> <p>16 trustworthiness, particularly in a role in</p> <p>17 which I have access to large sums of money.</p> <p>18 Q. But it's no longer on your credit</p> <p>19 report, right?</p> <p>20 MR. GOLDSON: Objection.</p> <p>21 MR. METCHO: Basis?</p> <p>22 MR. GOLDSON: Asked and answered.</p>	<p style="text-align: right;">Page 64</p> <p>1 MR. GOLDSON: Objection.</p> <p>2 MR. METCHO: Basis?</p> <p>3 MR. GOLDSON: Form and privilege.</p> <p>4 BY MR. METCHO:</p> <p>5 Q. Okay. Um, let me ask you this:</p> <p>6 What are you looking for here?</p> <p>7 MR. GOLDSON: Objection.</p> <p>8 MR. METCHO: Basis?</p> <p>9 MR. GOLDSON: Form --</p> <p>10 MR. METCHO: Okay. You can answer</p> <p>11 if you're able.</p> <p>12 MR. GOLDSON: -- and harassment.</p> <p>13 MR. METCHO: Harassment?</p> <p>14 MR. GOLDSON: On the record, form</p> <p>15 and harassment.</p> <p>16 BY MR. METCHO:</p> <p>17 Q. You can answer. You filed a lawsuit</p> <p>18 against several defendants here. What is your</p> <p>19 ultimate outcome of this litigation?</p> <p>20 A. I'm not sure.</p> <p>21 MR. METCHO: Okay. That's all I</p> <p>22 have right now.</p>

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<p style="text-align: right;">Page 65</p> <p>1 EXAMINATION</p> <p>2 BY MR. MARCUS:</p> <p>3 Q. I probably have about 5 minutes of</p> <p>4 questions.</p> <p>5 Ms. Long, again, I'm Morgan Marcus.</p> <p>6 I represent Pendrick. Your current job you're</p> <p>7 at Trusted Health Plans Incorporated, correct?</p> <p>8 A. That is correct.</p> <p>9 Q. And based upon your interrogatory</p> <p>10 responses that your attorney's provided to me,</p> <p>11 it indicates that you started there, I believe,</p> <p>12 September of --</p> <p>13 -- September 12, 2016. Does that</p> <p>14 sound accurate?</p> <p>15 A. Yes.</p> <p>16 Q. So when did you actually apply to</p> <p>17 work at Trusted Health Plans Inc?</p> <p>18 A. That was June 2016.</p> <p>19 Q. And you indicated earlier that you</p> <p>20 provided --</p> <p>21 -- that you signed a document, I</p> <p>22 believe you said, providing your employer the</p>	<p style="text-align: right;">Page 67</p> <p>1 background. It did not indicate that it was</p> <p>2 for a window of time.</p> <p>3 Q. But it was for the purposes of your</p> <p>4 application. Is that correct?</p> <p>5 A. It was the purpose of employment.</p> <p>6 You were required to complete and pass before</p> <p>7 being hired.</p> <p>8 -- in a condition of hire.</p> <p>9 Q. And to your knowledge did they</p> <p>10 provide --</p> <p>11 Did those documents have been</p> <p>12 provided --</p> <p>13 Strike that.</p> <p>14 You signed that document. Is that</p> <p>15 correct?</p> <p>16 A. I did sign the document.</p> <p>17 Q. And did they provide you a copy of</p> <p>18 that document? To your recollection.</p> <p>19 A. Um, I can't recall.</p> <p>20 Q. You indicated just now that one of</p> <p>21 your concerns was about potentially if you have</p> <p>22 to look for other jobs. Have you looked for</p>
<p style="text-align: right;">Page 66</p> <p>1 ability to check your credit. Is that correct?</p> <p>2 A. That is correct.</p> <p>3 Q. And when exactly would you have</p> <p>4 signed that document? Do you recall?</p> <p>5 A. When I applied during my</p> <p>6 application --</p> <p>7 Q. Would that have been --</p> <p>8 A. -- process.</p> <p>9 Q. I'm sorry for interrupting you.</p> <p>10 So that would have been June of</p> <p>11 2016?</p> <p>12 A. That's correct.</p> <p>13 Q. And if you can recall the specific</p> <p>14 document that you signed, did it give them the</p> <p>15 ability to only check your credit report during</p> <p>16 the application process?</p> <p>17 A. I can't recall.</p> <p>18 Q. Did it give them the ability to</p> <p>19 continuously check your credit report?</p> <p>20 A. It gave them permission. I can't</p> <p>21 speak to --</p> <p>22 It gave them permission to check my</p>	<p style="text-align: right;">Page 68</p> <p>1 any jobs since December of 2016?</p> <p>2 A. I've --</p> <p>3 I have been --</p> <p>4 I have checked in and out to see</p> <p>5 what the job market looked like. Yes.</p> <p>6 Q. What do you mean by that?</p> <p>7 A. I've looked at job posting sites. I</p> <p>8 have looked at what my skill set earning</p> <p>9 potential was during that time.</p> <p>10 Q. And have you applied for any jobs</p> <p>11 during that time period?</p> <p>12 A. I had, yes.</p> <p>13 Q. And where was that to?</p> <p>14 A. Several. I can't list them all.</p> <p>15 Q. When would that have happened?</p> <p>16 A. That was back in, I would say, May</p> <p>17 of 2017.</p> <p>18 Q. And you submitted applications. Is</p> <p>19 that what you're saying?</p> <p>20 A. That is correct.</p> <p>21 Q. You don't remember any of these</p> <p>22 companies that you submitted applications to?</p>

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1 A. One was for sure was Bond. It was a
2 healthcare company in Columbia. And they
3 request that I give permission to --
4 -- for not just a background, but
5 they specified a credit check.
6 Q. To your knowledge did they do a
7 credit check?
8 A. I'm not sure. I wasn't selected for
9 the job.
10 Q. Any other companies that you
11 submitted applications to?
12 A. None that I can recall.
13 Q. What was this company called? Bond?
14 A. Bond. I can't think of the name. I
15 think it was --
16 It was a Catholic healthcare company
17 in Columbia. I think it was Bond SE something.
18 I can't think of the name. It was a different
19 name. I can't remember.
20 Q. And what was the position that you
21 were applying for?
22 A. I believe it was --

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1 I believe it was a Controller role
2 or a Finance Manager role.
3 Q. And did they give you any reason --
4 Well, strike that.
5 You submitted your documents to
6 them, and did they bring you in for an
7 interview?
8 A. They did not.
9 Q. And did they give you any reason why
10 you weren't selected?
11 A. They did not.
12 Q. Ms. Long, you never had any direct
13 contact with Pendrick, right?
14 A. What do you define as "direct"?
15 Q. Did you ever have any telephone
16 conversations with Pendrick directly?
17 A. No.
18 Q. Did you ever send any written
19 communications directly to Pendrick?
20 A. No.
21 Q. Did you ever receive anything
22 directly from Pendrick?

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1 A. Define "directly".
2 Q. Did you ever receive any mailing
3 that came specifically from Pendrick, and not
4 from some other agency?
5 A. I received a letter from Ability on
6 behalf of Pendrick. I don't know if that's
7 considered direct, but that's what I received.
8 Q. Other than the letters that you
9 received from Ability, did you receive anything
10 else?
11 A. No.
12 Q. You indicated earlier that you have
13 three credit cards. Since December --
14 Have you had those three same credit
15 cards since December 2016?
16 A. Yes.
17 Q. I believe it was Chase, Barclay's
18 and Sealy's, you said?
19 A. That's correct.
20 Q. So continuously from December 2016
21 to today you've had those three cards, correct?
22 A. That's correct.

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1 Q. Other than that you haven't had any
2 other cards?
3 A. Not that I can recall.
4 Q. Have you ever missed any payments on
5 those cards?
6 A. No.
7 Q. Have you ever been --
8 On any debt have you ever missed a
9 payment on any debt? Not just those three
10 cards, any debt.
11 A. In what time period?
12 Q. Ever.
13 A. I'm sure when I was in college.
14 Q. And which debt was it? If you have
15 any idea.
16 A. I don't know.
17 Q. You think you may have missed one in
18 college?
19 A. You said "late".
20 Q. I'm sorry. Say that one more time.
21 A. You said "late".
22 Q. Yes.

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<p style="text-align: right;">Page 73</p> <p>1 A. Yeah, I'm sure I was late on a 2 payment. This was long before banks did the 3 payments for you. This was when you actually 4 had to mail stuff in. 5 Q. Have you ever defaulted on any debt? 6 A. Define "default". 7 Q. Made a payment past a payment due 8 date. 9 A. So would that be considered late? 10 Or is that considered default? 11 Q. Well, I think it depends on your 12 cardholder agreement. But have you made a 13 payment past the payment due date that you 14 negotiated with whatever entity that you got 15 the credit from? 16 A. Depending what time period are we 17 talking about? 18 Q. Ever. 19 A. I'm sure I did. 20 Q. And it's your position that you 21 never missed a payment with those three ones we 22 talked about -- Chase, Barclay's and Sealy's?</p>	<p style="text-align: right;">Page 75</p> <p>1 A. I can't recall. 2 Q. Do you recall what the initial 3 interest rate was on the Chase card? 4 A. No, I do not. 5 Q. Your attorneys provided the document 6 that we've titled Long 1, which is in front of 7 you. 8 A. Uh-huh. 9 Q. It indicates that your interest rate 10 was 27.99 percent at some point. Do you know 11 when it started -- 12 -- when it went to 27.99 percent? 13 A. No, I do not recall. 14 Q. I want to provide you a document 15 that your attorney provided to me. It's 16 plaintiff's production Bates labeled 100. I 17 want you to take a second to review that, Ms. 18 Long. 19 For the record, why don't we mark 20 that as Long 2. 21 (Exhibit 2 marked for 22 identification.)</p>
<p style="text-align: right;">Page 74</p> <p>1 A. That is correct. 2 Q. When did you get the Chase card? 3 A. I can't recall that. That's 4 probably my oldest credit card. 5 Q. Has it been more than 5 years? 6 A. I would say so, probably. I can't 7 specify the date. I don't know. 8 Q. Do you know what the credit limit is 9 on your Chase credit card? 10 A. In terms of what time period? 11 Q. December 2016 'til May of -- 12 -- I think May of 2017. 13 A. I think it was 1600. 14 Q. And have you ever gone above your 15 credit limit -- 16 A. Yes. 17 Q. -- during that time period? 18 A. During that time period? I can't 19 recall. 20 Q. And when I asked you if you had ever 21 gone above that credit limit on that card, you 22 indicated the answer was "yes"?</p>	<p style="text-align: right;">Page 76</p> <p>1 Ms. Long, do you recognize this 2 document? Do you know what this document is? 3 A. It is -- 4 It looks like a snapshot of my 5 credit report for my Chase card from 6 TransUnion. 7 Q. And the top left indicates this was 8 from April 26, 2017. Is that correct? 9 A. That is also correct. 10 Q. And it's showing -- 11 Is this the Chase card that we've 12 been talking about? 13 A. Yes. 14 Q. And it shows the usage is 15 107 percent. Is that correct? 16 A. That's what it says. Yes. 17 Q. Okay. Since the Ability trade line 18 was reported, have you had a conversation with 19 anyone at your current employment regarding the 20 trade line? 21 A. I think I answered this, but do I 22 answer it for your response?</p>

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<p>1 Q. I don't believe it was answered, but</p> <p>2 if it has been then the question is being</p> <p>3 restated.</p> <p>4 A. Can you repeat the question.</p> <p>5 Q. Since --</p> <p>6 Why don't we have the Court Reporter</p> <p>7 repeat it so we make sure she can state it</p> <p>8 correctly.</p> <p>9 (Court Reporter read back.)</p> <p>10 A. I've not had any conversations about</p> <p>11 it --</p> <p>12 -- this trade line with my current</p> <p>13 employer.</p> <p>14 Q. And have you been provided with any</p> <p>15 documents from your current employer indicating</p> <p>16 that they have reviewed your credit report?</p> <p>17 A. I have received no documents.</p> <p>18 MR. MARCUS: That's all I have.</p> <p>19 MR. GOLDSOON: Just for the record,</p> <p>20 Long 1 and Long 2 are both marked confidential,</p> <p>21 and we do intend to mark portions of the</p> <p>22 deposition relating to personal information,</p>	<p>1 DEPOSITION ERRATA SHEET</p> <p>2 Our Assignment No. J1529142</p> <p>3 Case Caption:</p> <p>4 Crystal Long</p> <p>5 vs.</p> <p>6 Pendrick Capital Partners, II, LLC, et al</p> <p>7</p> <p>8</p> <p>9 DECLARATION UNDER PENALTY OF PERJURY</p> <p>10 I declare under penalty of perjury that I</p> <p>11 have read the entire transcript of my</p> <p>12 Deposition taken in the captioned matter or the</p> <p>13 same has been read to me, and the same is true</p> <p>14 and accurate, save and except for changes</p> <p>15 and/or corrections, if any, as indicated by me</p> <p>16 on the DEPOSITION ERRATA SHEET hereof, with the</p> <p>17 understanding that I offer these changes as if</p> <p>18 still under oath.</p> <p>19</p> <p>20 Signed on the _____ day of _____, 2018.</p> <p>21 _____</p> <p>22 Crystal M. Long</p>
<p>Page 78</p> <p>1 financial and other personal information, as</p> <p>2 confidential on this deposition as well, but</p> <p>3 that's it. I don't have any questions.</p> <p>4 Read and sign.</p> <p>5 MR. METCHO: Regular.</p> <p>6 MR. GOLDSOON: Copy, yes.</p> <p>7 MR. MARCUS: I'll hold out for now.</p> <p>8 (Deposition concluded at 2:24 p.m.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>Page 80</p> <p>1 DEPOSITION ERRATA SHEET</p> <p>2 Page No. _____ Line No. _____ Change to: _____</p> <p>3 _____</p> <p>4 Reason for change: _____</p> <p>5 Page No. _____ Line No. _____ Change to: _____</p> <p>6 _____</p> <p>7 Reason for change: _____</p> <p>8 Page No. _____ Line No. _____ Change to: _____</p> <p>9 _____</p> <p>10 Reason for change: _____</p> <p>11 Page No. _____ Line No. _____ Change to: _____</p> <p>12 _____</p> <p>13 Reason for change: _____</p> <p>14 Page No. _____ Line No. _____ Change to: _____</p> <p>15 _____</p> <p>16 Reason for change: _____</p> <p>17 Page No. _____ Line No. _____ Change to: _____</p> <p>18 _____</p> <p>19 Reason for change: _____</p> <p>20</p> <p>21 SIGNATURE _____ DATE: _____</p> <p>22 Crystal M. Long</p>

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1 DEPOSITION ERRATA SHEET

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19 Reason for change: _____

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21 SIGNATURE: _____ DATE _____

22 Crystal M. Long

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1 CERTIFICATE OF NOTARY PUBLIC

2 I, Terry L. Bradley, the officer before

3 whom the foregoing deposition was taken, do

4 hereby certify that the witness whose testimony

5 appears in the foregoing deposition was duly

6 sworn by me; that the testimony of said witness

7 was taken by me in shorthand and thereafter

8 reduced to computerized transcription under my

9 direction; that said deposition is a true

10 record of the testimony given by said witness;

11 that I am neither counsel for, related to, nor

12 employed by any of the parties to the action in


13 which this deposition was taken; and further,

14 that I am not a relative or employee of any

15 attorney or counsel employed by the parties

16 hereto, nor financially or otherwise interested

17 in the outcome of the action.

18 

19 Notary Public in and for

20 the State Of Maryland

21 My Commission expires: November 15, 2019

22